



August 31, 2022

**BY ECF**

The Honorable Judge Loretta A. Preska  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Ishan Wahi, et al., 22 Cr. 392 (LAP)**

Dear Judge Preska,

We represent Ishan Wahi in the above-referenced matter. With the consent of the government, we write to respectfully request Court approval of a transfer of assets to the Clerk of Court to satisfy one of Ishan Wahi's release conditions.

On August 3, 2022, this Court set Ishan Wahi's conditions of release, which included the liquidation of cash and securities from a brokerage account Mr. Wahi held with Robinhood to secure the \$1,000,000 personal recognizance bond. Since that time, Mr. Wahi has worked diligently to liquidate the Robinhood account and has now converted the securities and cash that were held in that account to cash held in the escrow at this firm.

After discussions between Mr. Wahi's counsel and the government, the parties agree that \$120,000 in cash from the proceeds of the Robinhood account is sufficient to secure the personal recognizance bond. We respectfully request that the Court authorize the transfer of this amount to the Clerk of Court to that end and that the Court permit Mr. Wahi and his counsel seven (7) days from the date of the order to effect that transfer.

We have conferred with the government, which consents to this request.

**SO ORDERED**

*Loretta A. Preska*  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

*8/31/22*

Respectfully,

*Andrew St. Laurent*

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